

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

**JANE DOES 1-9,**

**Plaintiffs,**

**vs.**

**COLLINS MURPHY et. al.,**

**Defendants.**

**Case No.: 7:20-CV-00947-DCC**

**MOTION FOR EXTENSION OF TIME**

---

**JANE DOE,**

**Plaintiff,**

**vs.**

**LIMESTONE UNIVERSITY et. al.,**

**Defendants.**

**Case No.: 7:21-CV-03193-DCC**

**MOTION FOR EXTENSION OF TIME**

Plaintiffs, by and through their undersigned counsel, and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure move the Court for an order extending the time within which the parties may conduct discovery.

This extension is being sought in good faith, for a proper purpose, and is not intended to unduly or unnecessarily delay these proceedings. The current deadline for the completion of Discovery is May 31, 2024. While the deadline for discovery has previously been extended, Plaintiffs respectfully request that the current deadline be extended by ninety (90) days, making the new deadline for the completion of discovery August 31, 2024. This request is only for the extension of the discovery deadline, and no other deadline shall be altered. Plaintiffs conferred with Defendants however they have not reached an agreement.

This motion is based upon the pleadings filed in this case, rules of Court, and such other matters as may be properly presented to the Court.

**WHEREFORE**, the Plaintiffs respectfully requests this Court grant Plaintiffs' Motion and enter an order extending the time in which they may conduct discovery by ninety (90) days.

**BELL LEGAL GROUP, LLC**

/s/ J. Edward Bell, III

J. Edward Bell, III (#1280)

Gabrielle A. Sulpizio (#12715)

Joshua M. W. Salley (#13214)

219 North Ridge Street

Georgetown, SC 29440

Telephone: (843) 546-2408

[jeb@belllegalgroup.com](mailto:jeb@belllegalgroup.com)

[gsulpizio@belllegalgroup.com](mailto:gsulpizio@belllegalgroup.com)

[jsalley@belllegalgroup.com](mailto:jsalley@belllegalgroup.com)

*Counsel for Plaintiffs*

**DOLT, THOMPSON, SHEPHERD &  
CONWAY, PSC**

Tyler S. Thompson (admitted *Pro Hac Vice*)

Liz J. Shepherd (admitted *Pro Hac Vice*)

Chad Propst (Admitted *Pro Hac Vice*)

13800 Lake Point Circle

Louisville, KY 40223

Telephone: (502) 244-7772

[tthompson@kytrial.com](mailto:tthompson@kytrial.com)

[lshepherd@kytrial.com](mailto:lshepherd@kytrial.com)

[jstanton@kytrial.com](mailto:jstanton@kytrial.com)

*Counsel for Plaintiffs*

**NATIONAL CENTER ON SEXUAL  
EXPLOITATION**

Danielle Bianculli Pinter ( admitted *Pro Hac Vice*)

Christen Price ( admitted *Pro Hac Vice*)

Peter Gentala (admitted *Pro Hac Vice*)

1201 F Street NW

Washington, D.C.20004

[dpinter@ncoselaw.org](mailto:dpinter@ncoselaw.org)  
[cprice@ncoselaw.org](mailto:cprice@ncoselaw.org)  
[pgentala@ncoselaw.org](mailto:pgentala@ncoselaw.org)

*Counsel for Plaintiffs*

May 17, 2023  
Georgetown, SC